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12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 **In re:**)
16) Bankruptcy Case
17 **PG&E CORPORATION**) No. 19-30088 (DM)
18)
19 **- and -**) Chapter 11
20)
21 **PACIFIC GAS AND ELECTRIC**) (Lead Case)
22 **COMPANY,**)
23) (Jointly Administered)
24 **Debtors.**)
25) Date: June 26, 2019
26) Time: 9:30 a.m.
27) Place: United States Bankruptcy Court
28) 450 Golden Gate Avenue
Courtroom 17
San Francisco, CA 94102
Judge: Hon. Dennis Montali
RE: Docket Nos. 2459 and 2631
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors
All papers shall be filed in the Lead Case,
No. 19-30088 (DM).

26 **JOINDER OF UNITED STATES OF AMERICA IN OBJECTION OF THE**
27 **CALIFORNIA STATE AGENCIES TO MOTION OF DEBTORS FOR ENTRY OF**
28 **PROTECTIVE ORDER PURSUANT TO FED. R. BANKR. P. 7026 AND 9014(c) AND**
11 U.S.C. § 105(a) GOVERNING DISCOVERY MATERIALS AND OTHER
INFORMATION [DOCKET NO. 2459]

1 The United States of America, on behalf of various federal agencies, as both a regulator and
2 creditor of the Debtors, hereby joins in the *Objection of the California State Agencies to Motion of*
3 *Debtors for Entry of Protective Order Pursuant to Fed. R. Bankr. P. 7026 and 9014(c) and 11 U.S.C.*
4 *§ 105(a) Governing Discovery Materials and Other Information [Docket No. 2459]* (Docket No. 2631)
5 (the "Objection").

6 For the reasons set forth in the Objection, the United States objects to the proposed Protective
7 Order being made applicable to governmental units and requests that the Court include in any such order
8 an express exception that it does not apply to governmental units.

9
10 Date: June 19, 2019

Respectfully submitted,

11 /s/ Matthew J. Troy
12 MATTHEW J. TROY
13 Senior Trial Counsel
14 Attorney for United States

15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on June 19, 2019, I electronically filed the foregoing JOINDER with the Clerk of the Court
17 by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

18 /s/ Matthew J. Troy
19 Matthew J. Troy
20 Senior Trial Counsel
21 Attorney for United States
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